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Attorneys for Defendant Bank of America, N.A.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RICHARD ZEITLIN, ADVANCED
TELEPHONY CONSULTANTS, MRZ
MANAGEMENT, LLC, DONOR
RELATIONS, LLC, TPFE, INC.,
AMERICAN TECHNOLOGY SERVICES,
COMPLIANCE CONSULTANTS,
CHROME BUILDERS CONSTRUCTION,
INC., and UNIFIED DATA SERVICES,

Plaintiffs,

v.

BANK OF AMERICA, N.A., and JOHN and
JANE DOES 1-100,

Defendants.

Case No.: 2:18-cv-01919-RFB-DJA

**DEFENDANT BANK OF AMERICA
N.A.'S NINTH SUPPLEMENT TO ITS
INITIAL DISCLOSURES**

Defendant Bank of America, N.A. ("BANA"), by and through its attorneys of record, Snell & Wilmer L.L.P., makes this Ninth Supplement to its Initial Disclosures in accordance with Federal Rules of Civil Procedure 26(a)(1) and 26(e) (updated or new information is in **bold**). This disclosure is subject to supplementation and/or amendment pursuant to Federal Rule of Civil Procedure 26(e).

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I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION THAT BANA MAY USE TO SUPPORT ITS CLAIMS OR DEFENSES

1. Richard Zeitlin
c/o Robert G. Bernhoft, Esq.
Thomas E. Kimble, Esq.
The Bernhoft Law Firm, S.C.
1402 E. Cesar Chavez Street
Austin, Texas 78702
Phone: 512.582.2100

AND

Joel F. Hansen, Esq.
Hansen & Hansen, LLC
9030 W. Cheyenne Avenue, #210
Las Vegas, Nevada 89129
Phone: 702.906.1300

Mr. Zeitlin is a plaintiff in this matter. BANA anticipates Mr. Zeitlin will testify regarding the allegations in the complaint.

2. Advanced Telephony Consultants – Fed. R. Civ. P. 30(b)(6) Witness(es)
c/o Robert G. Bernhoft, Esq.
Thomas E. Kimble, Esq.
The Bernhoft Law Firm, S.C.
1402 E. Cesar Chavez Street
Austin, Texas 78702
Phone: 512.582.2100

AND

Joel F. Hansen, Esq.
Hansen & Hansen, LLC
9030 W. Cheyenne Avenue, #210
Las Vegas, Nevada 89129
Phone: 702.906.1300

Advanced Telephony Consultants is a plaintiff in this matter. BANA anticipates Advanced Telephony Consultants' corporate designee will testify regarding the allegations in the complaint.

3. MRZ Management, LLC – Fed. R. Civ. P. 30(b)(6) Witness(es)
c/o Robert G. Bernhoft, Esq.
Thomas E. Kimble, Esq.
The Bernhoft Law Firm, S.C.
1402 E. Cesar Chavez Street
Austin, Texas 78702
Phone: 512.582.2100

///

1 **AND**

2 Joel F. Hansen, Esq.
3 Hansen & Hansen, LLC
4 9030 W. Cheyenne Avenue, #210
5 Las Vegas, Nevada 89129
6 Phone: 702.906.1300

7 MRZ Management, LLC is a plaintiff in this matter. BANA anticipates MRZ Management,
8 LLC's corporate designee will testify regarding the allegations in the complaint.

9 4. Donor Relations, LLC – Fed. R. Civ. P. 30(b)(6) Witness(es)
10 c/o Robert G. Bernhoft, Esq.
11 Thomas E. Kimble, Esq.
12 The Bernhoft Law Firm, S.C.
13 1402 E. Cesar Chavez Street
14 Austin, Texas 78702
15 Phone: 512.582.2100

16 **AND**

17 Joel F. Hansen, Esq.
18 Hansen & Hansen, LLC
19 9030 W. Cheyenne Avenue, #210
20 Las Vegas, Nevada 89129
21 Phone: 702.906.1300

22 Donor Relations, LLC is a plaintiff in this matter. BANA anticipates Donor Relations,
23 LLC's corporate designee will testify regarding the allegations in the complaint.

24 5. TPFE, Inc. – Fed. R. Civ. P. 30(b)(6) Witness(es)
25 c/o Robert G. Bernhoft, Esq.
26 Thomas E. Kimble, Esq.
27 The Bernhoft Law Firm, S.C.
28 1402 E. Cesar Chavez Street
 Austin, Texas 78702
 Phone: 512.582.2100

AND

 Joel F. Hansen, Esq.
 Hansen & Hansen, LLC
 9030 W. Cheyenne Avenue, #210
 Las Vegas, Nevada 89129
 Phone: 702.906.1300

 TPFE, Inc. is a plaintiff in this matter. BANA anticipates TPFE, Inc.'s corporate designee
will testify regarding the allegations in the complaint.

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1 6. American Technology Services – Fed. R. Civ. P. 30(b)(6) Witness(es)
2 c/o Robert G. Bernhoft, Esq.
3 Thomas E. Kimble, Esq.
4 The Bernhoft Law Firm, S.C.
5 1402 E. Cesar Chavez Street
6 Austin, Texas 78702
7 Phone: 512.582.2100

8 **AND**

9 Joel F. Hansen, Esq.
10 Hansen & Hansen, LLC
11 9030 W. Cheyenne Avenue, #210
12 Las Vegas, Nevada 89129
13 Phone: 702.906.1300

14 American Technology Services is a plaintiff in this matter. BANA anticipates American
15 Technology Services’ corporate designee will testify regarding the allegations in the complaint.

16 7. Compliance Consultants – Fed. R. Civ. P. 30(b)(6) Witness(es)
17 c/o Robert G. Bernhoft, Esq.
18 Thomas E. Kimble, Esq.
19 The Bernhoft Law Firm, S.C.
20 1402 E. Cesar Chavez Street
21 Austin, Texas 78702
22 Phone: 512.582.2100

23 **AND**

24 Joel F. Hansen, Esq.
25 Hansen & Hansen, LLC
26 9030 W. Cheyenne Avenue, #210
27 Las Vegas, Nevada 89129
28 Phone: 702.906.1300

29 Compliance Consultants is a plaintiff in this matter. BANA anticipates Compliance
30 Consultants’ corporate designee will testify regarding the allegations in the complaint.

31 8. Chrome Builders Construction, Inc. – Fed. R. Civ. P. 30(b)(6) Witness(es)
32 c/o Robert G. Bernhoft, Esq.
33 Thomas E. Kimble, Esq.
34 The Bernhoft Law Firm, S.C.
35 1402 E. Cesar Chavez Street
36 Austin, Texas 78702
37 Phone: 512.582.2100

38 ///

39 ///

1 **AND**

2 Joel F. Hansen, Esq.
 3 Hansen & Hansen, LLC
 4 9030 W. Cheyenne Avenue, #210
 Las Vegas, Nevada 89129
 Phone: 702.906.1300

5 Chrome Builders Construction, Inc. is a plaintiff in this matter. BANA anticipates Chrome
 6 Builders Construction, Inc.'s corporate designee will testify regarding the allegations in the
 7 complaint.

8
 9 9. Unified Data Services – Fed. R. Civ. P. 30(b)(6) Witness(es)
 10 c/o Robert G. Bernhoft, Esq.
 11 Thomas E. Kimble, Esq.
 12 The Bernhoft Law Firm, S.C.
 1402 E. Cesar Chavez Street
 Austin, Texas 78702
 Phone: 512.582.2100

13 **AND**

14 Joel F. Hansen, Esq.
 15 Hansen & Hansen, LLC
 16 9030 W. Cheyenne Avenue, #210
 Las Vegas, Nevada 89129
 Phone: 702.906.1300

17 Unified Data Services is a plaintiff in this matter. BANA anticipates Unified Data Services'
 18 corporate designee will testify regarding the allegations in the complaint.

19 10. Andrew Frey
 20 c/o United States Secret Service
 1700 Montgomery St, Suite 300
 21 San Francisco, CA 94111
 Phone: 415.576.1210

22 Andrew Frey is a former BANA employee. BANA may call Mr. Frey to testify regarding
 23 the facts and circumstances surrounding the allegations in, and defenses to, the complaint, including
 24 any other relevant facts, circumstances, or information.

25 ///

26 ///

27 ///

28

11. Denise Watkins
 c/o Amy F. Sorenson, Esq.
 Blakeley E. Griffith, Esq.
 Snell & Wilmer L.L.P.
 3883 Howard Hughes Parkway, Suite 1100
 Las Vegas, NV 89169
 Phone: 702.784.5200

Denise Watkins is a BANA employee. BANA may call Ms. Watkins to testify regarding the facts and circumstances surrounding the allegations in, and defenses to, the complaint, including any other relevant facts, circumstances, or information.

12. Jean Miller
 c/o Amy F. Sorenson, Esq.
 Blakeley E. Griffith, Esq.
 Snell & Wilmer L.L.P.
 3883 Howard Hughes Parkway, Suite 1100
 Las Vegas, NV 89169
 Phone: 702.784.5200

Jean Miller is a BANA employee. BANA may call Ms. Miller to testify regarding the facts and circumstances surrounding the allegations in, and defenses to, the complaint, including any other relevant facts, circumstances, or information.

13. Bank of America, N.A. – Fed. R. Civ. P. 30(b)(6) Witness(es)
 c/o Amy F. Sorenson, Esq.
 Blakeley E. Griffith, Esq.
 Snell & Wilmer L.L.P.
 3883 Howard Hughes Parkway, Suite 1100
 Las Vegas, NV 89169
 Phone: 702.784.5200

BANA is a defendant in this matter. BANA may call one or more witnesses to testify regarding the facts and circumstances surrounding the allegations in and defenses to the complaint, including any other relevant facts, circumstances, or information.

BANA has withdrawn non-parties David Dierks, Robert Piaro, and Phil LeConte from its disclosures because, upon further review and analysis, it has determined that they are not likely to have information that BANA may use to support its defenses or any other information relevant to the claims in this action.

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II. DOCUMENTS IN THE POSSESSION, CUSTODY, OR CONTROL OF BANA THAT IT MAY USE TO SUPPORT ITS CLAIMS OR DEFENSES

Without conceding their admissibility, BANA identifies the following documents:

BEG	BEND	DATE	DESCRIPTION
BANA000001	BANA000039	6/8/2018	Bank of America Deposit Agreement and Disclosures
BANA000040	BANA000066	2/6/2015	Bank of America Deposit Agreement and Disclosures
BANA000067	BANA000105	6/8/2018	Bank of America Deposit Agreement and Disclosures
BANA000106	BANA000144	11/10/2017	Bank of America Deposit Agreement and Disclosures
BANA000145	BANA000182	8/1994	Facts About Personal Deposit Account Programs, Bank of America Disclosure and Agreement
BANA000183	BANA000209	3/4/2016	Bank of America Deposit Agreement and Disclosures
BANA000210	BANA000210	8/27/2018	Letter R. Zeitlin to B. Moynihan
BANA000211	BANA000211	8/27/2018	Letter R. Zeitlin to G. Greener
BANA000212	BANA000214	8/10/2018	Letter D. Treuden to D. Leitsch
BANA000215	BANA00215	8/8/2018	Letter R. Zeitlin to B. Service
BANA000216	BANA000217	8/14/2018	Letter R. Rogers to D. Treuden and R. Bernhoft
BANA000218	BANA000220	8/15/2018	Letter D. Treuden to R. Rogers
BANA000221	BANA000223	8/9/2018	Letter D. Treuden to A. Frey
BANA000224	BANA000229	8/9/2018	Letter D. Treuden to A. Frey
BANA000230	BANA000230	8/10/2018	Letter A. Frey to D. Treuden
BANA000231	BANA000233	8/10/2018	Letter D. Treuden to D. Leitsch, copy received by A. Frey
BANA000234	BANA000234	8/27/2018	Letter A. Frey to D. Treuden
BANA000235	BANA000235	8/27/2018	Letter E.C. Rainey to R. Zeitlin
BANA000236	BANA000236	8/16/2018	Email R. Zeitlin to S. Hannah
BANA000237	BANA000237	8/16/2018	Email R. Zeitlin to S. Hannah
BANA000238	BANA000238	8/16/2018	Letter S. Hannah to R. Zeitlin
BANA000239	BANA000239	8/27/2018	Letter E.C. Rainey to R. Zeitlin
BANA000240	BANA000240	8/27/2018	Letter R. Zeitlin to G. Greener
BANA000241	BANA000241	8/27/2018	Letter R. Zeitlin to B. Moynihan
BANA000242	BANA000242	8/27/2018	Letter R. Zeitlin to B. Moynihan
BANA000243	BANA000243	9/19/2018	Letter E.C. Rainey to R. Zeitlin
BANA000244	BANA000246	8/16/2018	Email R. Zeitlin to S. Hannah

BEG	BEND	DATE	DESCRIPTION
BANA000247	BANA000247	5/9/2013	Annual Escrow Account Disclosure Statement for Account ending 1885 (Partially Redacted for Confidential Information)
BANA000249	BANA000294	1/2018 - 9/2018	Chrome Builders Construction, Inc.'s Business Advantage Account Statements, Account ending 4942
BANA000295	BANA000295	9/28/2018	Bank of America Cashier's Check #9506542338 to Chrome Builders Construction, Inc. for \$20,905.73
BANA000296	BANA000297	9/24/2018	Letter Bank of America to Chrome Builders Construction, Inc. re Closure of Account ending 4942
BANA000296	BANA000297	9/24/2018	Letter Bank of America to Chrome Builders Construction, Inc. re Closure of Account ending 4942
BANA000298	BANA000393	Various	Bank Policies and Procedures
BANA000394	BANA000411	Various	CFPB Consumer Complaints
BANA000412	BANA000414	8/10/2018	Letter D. Treuden to D. Leitsch
BANA000415	BANA000434	Various	FDIC/Federal Reserve/CFPB/OCC Consumer Complaints
BANA000435	BANA000438	Various	Transaction Records
BANA000439	BANA000442	Various	Account Signature Cards
BANA000443	BANA000517	Various	Transaction Records
BANA000518	BANA000519	12/27/2017	Account Signature Card for Compliance Consultants LLC
BANA000520	BANA001897	Various	Transaction Records
BANA001898	BANA001961	Various	FEC Forms/Filings
BANA001962	BANA001962		Excel file re Online Account Identification Information
BANA001963	BANA001992	Various	Transaction Records
BANA001993	BANA002004	1/21/2010	Settlement Agreement and Order
BANA002005	BANA002008	Various	FEC Forms/Filings
BANA002009	BANA002011	Various	Transaction Records
BANA002012	BANA002012	1/2013 – 8/2018	Excel File Containing Transaction Data
BANA002013	BANA002042	Various	Transaction Records
BANA002043	BANA002048	Various	FEC Forms/Filings
BANA002049	BANA002095	Various	Account Signature Cards
BANA002096	BANA002096	12/2017 – 8/2018	Excel File Containing Transaction Data
BANA002097	BANA002126	Various	FEC Forms/Filings
BANA002127	BANA002128	8/8/2018	Letter J. Parsons to A. Frey

BEG	BEND	DATE	DESCRIPTION
BANA002129	BANA002129	5/2018 – 8/2018	Excel File re Account Login Activity
BANA002130	BANA002130	9/2015 – 8/2018	Excel File re Customer Call Log
BANA002131	BANA002145	Various	FEC Forms/Filings
BANA002146	BANA002146		Excel File re Address Information
BANA002147	BANA002194	Various	FEC Forms/Filings
BANA002195	BANA002202	8/24/2013	News21 Article
BANA002203	BANA002235	Various	FEC Forms/Filings
BANA002236	BANA002236	Various	Excel File re Account Login Activity
BANA002237	BANA002301	Various	Account Signature Cards
BANA002302	BANA002308	5/4/2018	Politico Article
BANA002309	BANA002338	Various	Transaction Records
BANA002339	BANA002339	Various	Excel File Containing Transaction Data
BANA002340	BANA002369	Various	Transaction Records
BANA002370	BANA002378	1/19/2010	Settlement Agreement and Order re Courtesy Call, Inc.
BANA002379	BANA002409	Various	Articles
BANA002410	BANA002555	Various	FEC Forms/Filings
BANA002556	BANA002556	8/2018	Excel File re Online Account Activity
BANA002557	BANA002599	Various	FEC Forms/Filings
BANA002600	BANA002603	Various	Articles
BANA002604	BANA002613	Various	FEC Forms/Filings
BANA002614	BANA002614		Excel File re Customer Information
BANA002615	BANA002656	Various	Transaction Records
BANA002657	BANA002773	Various	Account Signature Cards
BANA002774	BANA002774	2018	Excel File Containing Transaction Data
BANA002775	BANA002995	Various	Account Signature Cards and Related Documents
BANA002995	BANA002996	Various	Chrome Builders Account Information
BANA002997	BANA002997	Various	Excel file re Account Status Information
BANA002998	BANA003005	Various	FDIC/Federal Reserve/CFPB/OCC Consumer Complaints
BANA003006	BANA004894	Various	Account Opening Policies and Procedures
BANA004895	BANA004895	2016-2018	Excel File Containing Transaction Data
BANA004896	BANA005343	Various	Account Statements
BANA005344	BANA005344		Excel File re Transactional Data
BANA005345	BANA005345		Excel File re Transactional Data
BANA005346	BANA005346	8/17/2018	Email J. Miller to J. Miller, A. Frey re Conversation with Miller

BEG	BEND	DATE	DESCRIPTION
BANA005347	BANA005347	8/17/2018	Email J. Miller to J. Miller, A. Frey re Conversation with J. Miller
BANA005348	BANA005348	8/17/2018	Email R. Forest to R. Forest, A. Frey re Conversation with R. Forest
BANA005349	BANA005451	6/29/2016	Global Policy Source: Enterprise – Financial Crimes Global Standard
BANA005452	BANA005455	9/17/2018	CFPB – R. Zeitlin Complaint # 180904-3449326 Details
BANA005456	BANA005460	9/19/2018	CFPB – R. Zeitlin Complaint # 180904-3449326 Details
BANA005461	BANA005464	8/20/2018	CFPB – R. Zeitlin Complaint # 180817-3411124 Details
BANA005465	BANA005465	8/27/2018	Letter E.C. Rainey to R. Zeitlin
BANA005466	BANA005466	8/16/2018	Letter S. Hannah to R. Zeitlin
BANA005467	BANA005471	9/17/2018	CFPB – R. Zeitlin Complaint # 180829-3439362 Details
BANA005472	BANA005474	8/10/2018	Letter D. Treuden to D. Leitsch
BANA005475	BANA005477		R. Zeitlin FDIC Complaint
BANA005478	BANA005478	8/16/2018	Email R. Zeitlin to S. Hannah
BANA005479	BANA005480	8/10/2018	R. Zeitlin Federal Reserve Consumer Help Request
BANA005481	BANA005482	8/19/2018	R. Zeitlin Federal Reserve Consumer Help Request
BANA005483	BANA005486	9/4/2018	CFPB – R. Zeitlin Complaint # 180829-3439362 Details
BANA005487	BANA005490	8/10/2018	Office of the Comptroller of Currency (OCC) - R. Zeitlin Complaint
BANA005491	BANA005493	8/9/2018	Letter D. Treuden to A. Frey
BANA005494	BANA005498	9/19/2018	CFPB – R. Zeitlin Complaint # 180829-3439362 Details
BANA005499	BANA005499	9/19/2018	Letter E.C. Rainey to R. Zeitlin
BANA005500	BANA005500	10/24/2018	Bank of America Account Information for American Technology Services LLC
BANA005501	BANA005501	10/24/2018	Bank of America Account Information for Donor Relations LLC
BANA005502	BANA005502	10/24/2018	Bank of America Account Information for Unified Data Services LLC
BANA005503	BANA005503	10/24/2018	Bank of America Account Information for TPFE Inc.
BANA005504	BANA005504	10/24/2018	Bank of America Account Information for Advance Telephony Consultants LLC
BANA005505	BANA005505	10/24/2018	Bank of America Account Information for Chrome Builders Construction Inc.

BEG	BEND	DATE	DESCRIPTION
BANA005506	BANA005506	10/24/2018	Bank of America Account Information for Integrated Telecom Inc.
BANA005507	BANA005507	10/24/2018	Bank of America Account Information for Compliance Consultants LLC
BANA005508	BANA005508	10/24/2018	Bank of America Account Information for American Technology Services LLC
BANA005509	BANA005547	4/7/2017	Deposit Agreement and Disclosures
BANA005548	BANA005617	1/1/2018 – 10/31/2018	Account Statements for American Technology Services LLC Account ending 6874
BANA005618	BANA005644	11/4/2016	Deposit Agreement and Disclosures
BANA005645	BANA005679	02/1994	Bank of America Facts About Business Deposit Account Programs
BANA005680	BANA005733	06/1994	Bank of America Depositor's Agreement and Electronic Funds Transfer Disclosure for Checking Accounts, Savings, Time Deposits and IRAs
BANA005734	BANA005760	06/1993	Bank of America Depositor's Agreement and Electronic Funds Transfer Disclosure for Checking Accounts, Savings, Time Deposits and IRAs
BANA005761	BANA005763		Summaries re Investigation
BANA005764	BANA005764	12/2017 – 8/2018	Excel File Containing Transaction Data
BANA005765	BANA005765		Chart re: Administracion De Call Centers SA Panama
BANA005766	BANA005781		Summaries re Investigation ¹
BANA005782	BANA005819	8/7/2018	Calendar Entries re Administration De Call Centers Overview and Attachments
BANA005820	BANA005820	Various	Excel File Containing Transaction and Account Detail Data
BANA005821	BANA005823		Graphics reflecting transaction data
BANA005824	BANA005824	Various	Excel File Containing Transaction and Account Detail Data
BANA005825	BANA005846		Graphics reflecting transaction data
BANA005847	BANA005847	Various	Excel File Containing Transaction and Account Detail Data
BANA005848	BANA005848	Various	Excel File Containing Account and Computer Activity Data
BANA005849	BANA005849		Graphic reflecting IP addresses and other information

¹ As explained in the accompanying email of April 27, 2020, BANA005770-5780 are re-produced herewith with revised redactions.

BEG	BEND	DATE	DESCRIPTION
BANA005850	BANA005850	Various	Excel File Containing Transaction and Account Detail Data
BANA005851	BANA005890		Summaries regarding entity transactions and graphics regarding same
BANA005891	BANA005891	Various	Excel File Containing Transaction Data
BANA005892	BANA005896	8/16/2018	Email J. Miller to A. Frey re Conversation with Miller, Jean M. ²
BANA005897 ³	BANA005902	7/23/2018	ForeignAffairs Article Titled <i>24 Sentenced in Multimillion Dollar India-Based Call Center Scam Targeting U.S. Victims</i>
BANA005903	BANA005909	8/27/2018 – 9/15/2018	Bank of America meeting appointment details re Zeitlin Matter
BANA005910	BANA005912	7/27/2018	Pahrump Valley Times Article Titled <i>U.S. Justice Officials uncover call center scam</i>
BANA005913	BANA005913		Excel File Containing Transaction and Account Detail Data
BANA005914	BANA005953	7/26/2018	Email D. Watkins to D. Martinez re Charities/PAC Scam Project and attachments to same
BANA005954	BANA005957		Excel Files Containing Transaction and Account Detail Data
BANA005958	BANA005958	2/7/2020	UPS Delivery Confirmation
BANA005959	BANA005959	8/30/2018	Email R. Forest to J. Miller re Zeitlin Timeline
BANA005960	BANA005964	8/29/2018	Investigation Timeline
BANA005965	BANA005965	8/17/2018	Email A. Frey to R. Forest and J. Miller re Zeitlin
BANA005966	BANA005966		Summary re Investigation
BANA005967	BANA005967	8/29/2018	Email J. Miller to R. Forest forwarding investigation document attachment
BANA005968	BANA005968		Flow Chart re Donations
BANA005969	BANA005969	8/17/2018	Email A. Frey to R. Forest re Zeitlin and attachments
BANA005970	BANA005970		Flow Chart re Administracion De Call Centers SA Panama
BANA005971	BANA005971		Summary of Investigation

² As explained in the email of April 27, 2020, BANA005892-5896 were re-produced with revised redactions.

³ On February 21, 2020, BANA produced a UPS delivery confirmation bates stamped BANA005897. BANA's production of documents on April 27, 2020 inadvertently includes a different document, the first page of a July 23, 2018, Foreign Affairs article, also labeled BANA005897. Herewith, BANA produces again the UPS Delivery confirmation, revised to be labeled as BANA005958, and BANA005897 will be used for the Foreign Affairs article.

BEG	BEND	DATE	DESCRIPTION
BANA005972	BANA005972		Flow Chart re Donations
BANA005973	BANA005977	9/25/2018	Email J. Miller to R. Forest
BANA005978	BANA005979	9/24/2018	Email J. Miller to R. Forest re Expedited Account Closures
BANA005980	BANA005980	8/29/2018	Email A. Frey to J. Miller and R. Forest re High Level Summary
BANA005981	BANA005981		Investigation Summary
BANA005982	BANA005986		Investigation Summary
BANA005987	BANA005989	8/9/2018	Email A. Guibernau to D. O'Reilly re Charities/PAC Scam Project
BANA005990	BANA005991	7/30/2018	Email D. O'Reilly to D. Martinez, cc F. Danek and A. Guibernau re Charities/PAC Scam Project
BANA005992	BANA005994	7/30/2018	Emails between D. O'Reilly and A. Guibernau re Charities/PAC Scam Project

These documents are produced via a password protected link and have been emailed to counsel. In addition, without conceding their admissibility, BANA identifies all documents identified by any party in their disclosures, discovery responses, or documents disclosed in this litigation.

BANA will supplement this disclosure as required by the Federal Rules of Civil Procedure and any applicable scheduling order entered by the Court.

III. COMPUTATION OF ANY CATEGORY OF DAMAGES

BANA does not claim any damages, but it may seek reasonable attorney's fees and costs in defense of this action.

IV. APPLICABLE INSURANCE AGREEMENTS

BANA has no insurance policy or reimbursement or indemnity agreement that in all reasonable possibility would be called upon to respond in whole or in part to the claims in this lawsuit.

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///

1 DATED September 4, 2020.

2 SNELL & WILMER L.L.P.

3 By: /s/Kiah D. Beverly-Graham

4 Amy F. Sorenson, Esq.

5 Nevada Bar No. 12495

6 Blakeley E. Griffith, Esq.

7 Nevada Bar No.: 12386

8 Kiah D. Beverly-Graham, Esq.

9 Nevada Bar No. 11916

10 3883 Howard Hughes Parkway, Suite 1100

11 Las Vegas, NV 89169

12 *Attorneys for Defendant Bank of America, N.A.*

CERTIFICATE OF SERVICE

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing on all parties appearing herein by the method indicated:

_____ U.S. Mail
 _____ U.S. Certified Mail
 X Electronic Mail (E-mail)
 _____ Overnight Mail
 _____ Federal Express
 _____ Hand Delivery
 _____ Electronic Filing

and addressed to:

Thomas E. Kimble, Esq. tekimble@bernhoflaw.com
 Roger Bernhoft, Esq. rgbernhof@bernhoflaw.com
 Daniel J. Treuden, Esq. djtreuden@bernhoflaw.com
 The Bernhoft Law Firm, S. C.
 1402 E. Cesar Chavez Street
 Austin, TX 78702

Attorneys for Plaintiffs

DATED: September 4, 2020.

/s/Debbie Shuta
 An Employee of Snell & Wilmer L.L.P.

4813-6328-5695.1

Snell & Wilmer

L.L.P.
 LAW OFFICES
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 Las Vegas, Nevada 89169
 702.784.5200